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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY  
DEFAULT ON MOTION FOR ENTRY OF  
AN ORDER FURTHER EXTENDING  
DEADLINE FOR THE REORGANIZED  
DEBTORS TO OBJECT TO CLAIMS AND  
FOR RELATED RELIEF**

**[Re: Docket No. 11450]**

1                                    **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2            PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the  
3 “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized**  
4 **Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request,  
5 pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court  
6 for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second*  
7 *Amended Order Implementing Certain Notice and Case Management Procedures* entered on May  
8 14, 2019 [Docket No. 1996] (“**Case Management Order**”), that the Court enter an order by default  
9 on the *Motion for Entry of an Order Further Extending Deadline for the Reorganized Debtors to*  
10 *Object to Claims and for Related Relief* filed by the Reorganized Debtors on October 19, 2021  
11 [Docket No. 11450] (the “**Motion**”)¹.

12                                    **RELIEF REQUESTED IN THE APPLICATION**

13            The Motion seeks entry of an order (i) further extending the deadline established under the  
14 Plan for the Reorganized Debtors to object to Claims by an additional one hundred eighty (180) days,  
15 through and including June 21, 2022, without prejudice to the Reorganized Debtors’ right to seek  
16 additional extensions thereof; and (ii) granting related relief. A proposed order (the “**Original**  
17 **Proposed Order**”) was attached as Exhibit A to the Motion.

18                                    **NOTICE AND SERVICE**

19            A notice of hearing on the Motion was filed on October 19, 2021 [Docket No. 11452] (the  
20 “**Notice of Hearing**”). The Motion, the Notice of Hearing, and the supporting declaration of Robb  
21 McWilliams [Docket No. 11451] were served as described in the Certificate of Service of Sonia Alter,  
22 filed on October 22, 2021 [Docket No. 11469]. The deadline to file responses or oppositions to the  
23 Motion has passed, and no responses or oppositions have been filed with the Court or received by  
24 counsel for the Reorganized Debtors. The Reorganized Debtors have received informal comments on  
25 the Motion from counsel for the Office of the Attorney General of California on behalf of the  
26 California Department of Water Resources (“**DWR**”) and the California Department of Forestry and

27 \_\_\_\_\_  
28 ¹ Capitalized terms not herein defined shall have the meanings ascribed to them in the Motion.

1 Fire Protection (“**CAL FIRE**”). The Debtors have agreed to certain changes to the Original Proposed  
2 Order to address the comments of the DWR and CAL FIRE, by (i) extending the deadline for the  
3 Reorganized Debtors to object to the Claim filed by the DWR through and including March 23, 2022,  
4 without prejudice to the right of the Reorganized Debtors to move for a further extension of such date;  
5 and (ii) clarifying that the relief granted in the Revised Proposed Order does not apply to the existing  
6 deadlines for the Reorganized Debtors to object to the CAL FIRE Claims and the United States Claims.  
7 A revised form of proposed order (the “**Revised Proposed Order**”) reflecting these agreed upon  
8 changes is attached hereto as **Exhibit A**. A redline comparison of the Original Proposed Order and  
9 the Revised Proposed Order is attached hereto as **Exhibit B**.

10 **DECLARATION OF NO OPPOSITION RECEIVED**

11 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

12 1. I am an attorney with the firm of Keller Benvenuti Kim LLP, co-counsel for the  
13 Reorganized Debtors.

14 2. I have reviewed the Court’s docket in the Chapter 11 Cases and have determined that  
15 no response or opposition has been filed with respect to the Motion.

16 3. This declaration was executed in Sunnyvale, California.

17 WHEREFORE, the Reorganized Debtors hereby request entry of the Revised Proposed Order  
18 attached as **Exhibit A** hereto, granting the Motion as set forth therein.

19  
20 Dated: November 4, 2021

**WEIL, GOTSHAL & MANGES LLP**  
**KELLER BENVENUTTI KIM LLP**

21  
22 /s/ Thomas B. Rupp  
Thomas B. Rupp

23 *Attorneys for Debtors and Reorganized Debtors*  
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